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LAURI VALJAKKA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendants.

Case No. 4:22-cv-01490-JST

[PROPOSED] CASE SCHEDULE

Judge: Hon. Jon S. Tigar

Plaintiff Lauri Valjakka (“Valjakka”) and Defendant Netflix, Inc. (“Netflix”) (collectively “the Parties”) hereby submit this Proposed Schedule pursuant to the Court’s March 30, 2022, Case Management Conference Order in Reassigned Case. (Dkt 27).

Date	Description
12/27/2022	Parties to submit proposed schedule for fact discovery deadline, expert discovery, dispositive and Daubert motions, pretrial, and trial.
01/10/2023	Final election of asserted claims to no more than 10 claims
2/14/2023, 2:00pm PST	Case Management Conference
03/13/2023	Proposed date for Designation of Experts
05/12/2023	Close of fact discovery
05/19/2023	Deadline to file discovery motions relating to fact discovery
06/02/2023	Opening expert reports due
07/14/2023	Rebuttal expert reports due
07/25/2023	Deadline to move for relief from order on grounds specified in FRCP 60(b)(1), (2) or (3)
08/11/2023	Close of expert discovery
09/08/2023	Opening summary judgment / Daubert briefs
09/22/2023	Responsive summary judgment / Daubert briefs
09/29/2023	Reply summary judgment / Daubert briefs
Subject to the convenience of the Court’s calendar	Hearing on summary judgment/Daubert briefs
Subject to the convenience of the Court’s calendar	Pretrial Conference
Subject to the convenience of the Court’s calendar	Trial

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2 Dated: December 27, 2022

Respectfully submitted,

3 MAHAMEDIP LAW LLP

4 /s/ Susan S.Q. Kalra

5 Susan S.Q. Kalra, CA SBN 167940

6
7 *Attorney for Plaintiff Lauri Valjakka*

8
9 Dated: December 27, 2022

PERKINS COIE, LLP

10 /s/ Sarah E. Piepmeier - DRAFT

11 Sarah E. Piepmeier, CA SBN 227094

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14 *Attorney for Defendant Netflix, Inc.*

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PROPOSED ORDER

IT IS HEREBY ORDERED, that the above case schedule is approved.

IT IS SO ORDERED

DATED: _____

Hon. Jon S. Tigar